

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NEALY L. SKELDON,)	
)	
Plaintiff,)	Case No. 1:25-cv-06078
)	
v.)	
)	District Judge Joan B. Gottschall
DERMACARE USA CORPORATION,)	
<i>et al.</i> ,)	Magistrate Judge Jeffrey T. Gilbert
)	
Defendants.)	
)	

**PLAINTIFF’S PARTIALLY OPPOSED MOTION TO REQUEST
TIME TO REDRAFT COMPLAINT**

Plaintiff, Nealy L. Skeldon, by her attorneys at Williams, Bax & Saltzman, P.C., for her Motion to Request Time to Redraft Complaint pursuant to 735 ILCS 5/2-616(a), states as follows:

1. On May 27, 2025, Plaintiff filed her complaint through attorney Vlad Chirica, of Chirica Law Office LLC.
2. On June 20, 2025, Defendants filed motions to dismiss the complaint.
3. On June 24, 2025, attorneys Thomas Koessler and Hilarie Carhill, from Williams, Bax & Saltzman, P.C. filed their appearances.
4. On June 27, 2025, Plaintiff filed a motion to substitute attorneys from Williams, Bax & Saltzman, P.C. (“new counsel”) for counsel from Chirica Law Office LLC.
5. On June 30, 2025, Hon. Joan B. Gottschall granted Plaintiff’s unopposed motion to substitute counsel.

6. Having reviewed the Complaint and the Motions to Dismiss, new counsel requests leave to redraft the complaint, rather than to respond to the Motions to Dismiss.

7. New counsel requests 21 days, until July 31, 2025, to redraft the Complaint.

8. On July 9, 2025, Plaintiff's counsel emailed Defendants' counsel to confer regarding this motion for time to redraft the complaint. On July 10, 2025, counsel spoke over the phone and Defendants' counsel stated that Defendants do not object to Plaintiff taking 14 days to redraft the complaint, although Defendants do object to Plaintiff's request for 21 days to redraft the complaint. So Plaintiff's motion is unopposed through the first 14 days requested to redraft the complaint.

WHEREFORE, Plaintiff Skeldon respectfully requests that the Court extend 21 days to new counsel to allow time to redraft the Complaint.

Respectfully submitted,

NEALY SKELDON

By: /s/ Hilarie M. Carhill
One of the Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Hilarie M. Carhill